

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

WILLIAM SAVOIE,

Plaintiff,

v.

GULICK TRUCKING, INC.,

Defendant.

CASE NO. 3:22-cv-05618-MLP

**STIPULATED
MOTION AND
PROPOSED ORDER
EXTENDING TRIAL
DATE AND RELATED
DEADLINES**

**STIPULATED MOTION EXTENDING TRIAL DATE
AND OTHER RELATED DEADLINES**

On November 4, 2022 this Court entered a Minute Order (Dkt. 14) setting a trial date of September 25, 2023 for this matter, as well as a summary judgment deadline of May 22, 2023 and other related dates.

The parties are cooperatively and diligently working on discovery, including review and production of electronically stored data. The parties are also cooperatively and diligently working on the scheduling of depositions; however, those depositions cannot occur prior to the completion of written discovery, which the parties need more time to complete. Counsel for Plaintiff similarly has a two-week jury trial scheduled to start on April 3, 2023 (No: 2:20-cv-01775-RSL), which has created some unavailability of counsel.

So that the parties have sufficient time to complete written discovery and depositions, as well as ADR, the parties have agreed to respectfully request that the Court postpone the trial date and related dates in this case. The parties agree on the below schedule for proposed new dates:

Event	Deadline set on November 4, 2022	Requested New Deadline
Reports of expert witnesses under FRCP 26(a)(2) due	March 6, 2023	June 5, 2023
All motions related to discovery must be FILED by this date and noted for consideration no later than the third Friday thereafter (see LCR7(d))	March 20, 2023	June 19, 2023
Rebuttal expert disclosures under FRCP 26(a)(2) due	April 6, 2023	July 6, 2023
Discovery to be completed by	April 20, 2023	July 20, 2023
All dispositive motions must be FILED by	May 22, 2023	August 21, 2023
Mediation per LCR 39.1 held no later than	July 21, 2023	September 22, 2023
Motions in limine should be FILED by and NOTED on the motions calendar no later than the third Friday thereafter, but no later than the Friday before any scheduled pretrial conference	August 21, 2023	November 13, 2023
Agreed pretrial order LODGED with the court by	September 5, 2023	December 4, 2023
Pretrial conference will be HELD on	TBD	TBD
Trial briefs, proposed voir dire & jury instructions due	September 11, 2023	December 11, 2023
JURY TRIAL set for	September 25, 2023	December 18, 2023 January 22, 2024

The parties respectfully request an extension of all dates as set forth above, or a further extension as may be convenient for the Court's trial calendar.

MBE LAW GROUP PLLC

BULLARD LAW

By: Lisa Burke

Lisa A. Burke, WSBA No. 42859
 1700 Seventh Ave. #2100
 Seattle, WA 98101
 206-400-7722
lburke@mbelg.com

By: Ed Choi

Ed Choi, OSB No. 135673
 200 SW Market Street # 1950
 Portland, OR 97201
 503-248-1134
echoi@bullardlaw.com

Attorneys for Plaintiff

Attorneys for Defendants

[PROPOSED] ORDER

IT IS SO ORDERED.

DATED: March 3, 2023


MICHELLE L. PETERSON
 United States Magistrate Judge